## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: MDL No. 2:12-md-02327

ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

MICHELLE ROSE,

Plaintiff,

٧.

JOHNSON & JOHNSON,

Defendant.

## MOTION TO WITHDRAW AS COUNSEL TO PLAINTIFF MICHELLE ROSE

The Petitioner, Elliott Schuchardt, files this motion to withdraw as counsel to Plaintiff Michelle Rose. In support hereof, Schuchardt states as follows:

- On October 9, 2013, Schuchardt filed a complaint on behalf of Michelle
   Rose in the Court of Common Pleas of Allegheny County, Pennsylvania.
- 2. The complaint alleges that Rose sustained personal injuries after implantation of a pelvic mesh product manufactured by the Defendant.
- 3. On December 23, 2013, the Defendant removed the case to the United States District Court for the Western District of Pennsylvania.
- 4. On January 8, 2014, the case was transferred to this Court as part of the above-captioned multi-district litigation.

5. Since late 2014, Schuchardt has lost communication with Ms. Rose. Schuchardt has made numerous attempts to contact her, including numerous telephone calls and voicemails, electronic mail and mail.

WHEREFORE, for the reasons set forth above, the undersigned attorney, Elliott Schuchardt, respectfully requests leave to withdraw from this case.

Respectfully submitted,

By: /s/ Elliott Schuchardt Elliott J. Schuchardt PA I.D. #27016

SCHUCHARDT LAW FIRM U.S. Steel Tower, Suite 660 600 Grant Street Pittsburgh, PA 15219 Phone: (540) 409-8893 E-mail: elliott016@gmail.com

Counsel for the Plaintiff

**CERTIFICATE OF SERVICE** 

I, Elliott Schuchardt, hereby certify that I served a true and correct copy of the

foregoing motion and proposed order on all persons registered to receive notice in this

case by means of the Court's CM/ECF system on this 29<sup>th</sup> day of October 2015. I also

served copies of this document on the same day on the following persons in the manner

indicated below:

**VIA U.S. MAIL, POSTAGE PREPAID:** 

Michelle Rose 133 N. Jefferson Avenue, #3

Canonsburg, PA 15317

Ms. Michelle Rose

84 West Wheeling Street

Washington, PA 15301

VIA E-MAIL:

Michelle Rose

michellerose960@yahoo.com

By: /s/ Elliott Schuchardt
Elliott J. Schuchardt